

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VIVENDI S.A.,)
Plaintiff,)
v.)
T-MOBILE USA, INC, T-MOBILE)
DEUTSCHLAND GMBH, T-MOBILE)
INTERNATIONAL AG, DEUTSCHE)
TELEKOM AG, AND ZYGMUNT SOLORZ-)
ZAK,)
Defendant.)
No. CV6 1524JLR
[PROPOSED] ORDER
GRANTING DT DEFENDANTS
MOTION FOR PROTECTIVE
ORDER

This matter came before the Court on the motion of Defendants Deutsche Telekom AG, T-Mobile Deutschland GmbH, T-Mobile International AG, and T-Mobile USA, Inc. (the “DT Defendants”) for a protective order staying discovery in this action pending resolution of their motion to dismiss. The Court has considered the pleadings and papers filed by the parties in connection therewith, arguments of counsel, and all other matters presented to the Court. Based on those materials and arguments,

IT IS HEREBY ORDERED that the DT Defendants' motion is GRANTED as follows:

Discovery in this action is hereby stayed pending the resolution of the DT Defendants' forthcoming motion to dismiss.

1 **IT IS SO ORDERED.**
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4 Dated: _____, 2007

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7 The Honorable James L. Robart
8 United States District Judge

9 Submitted by:

10 Davis Wright Tremaine LLP and Wilmer Cutler Pickering Hale and Dorr LLP
11 Attorneys for Defendants
12 Deutsche Telekom AG, T-Mobile Deutschland GmbH,
13 T-Mobile International AG, and T-Mobile USA, Inc.

14 By: /s/ Stephen M. Rummage

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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2007, I electronically filed the foregoing [Proposed] Order Granting Defendants Motion for Protective Order with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Robert E. Rohde: brohde@rohdelaw.com

Lanny J. Davis: ldavis@orrick.com

DATED this 2nd day of March, 2007.

Davis Wright Tremaine LLP
Attorneys for Defendants T-Mobile USA, Inc.,
T-Mobile Deutschland GmbH, T-Mobile
International AG, and Deutsch Telekom AG

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